

EXHIBIT 4

Declaration of Dr. Patricia Hastings

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION)
)
This Document Relates to:)
ALL CASES)

DECLARATION OF DR. PATRICIA HASTINGS

1. I, Dr. Patricia Hastings, make the following declaration in lieu of an affidavit as permitted by 28 U.S.C. § 1746. I am aware that this declaration will be filed with the United States District Court for the Eastern District of North Carolina, and that it is the legal equivalent of a statement under oath.

2. Currently, I am the Chief Consultant for the Department of Veteran Affairs' Health Outcomes Military Exposures ("HOME") group. HOME (formerly called the Post Deployment Health Services) administers programs related to environmental and occupational exposures of U.S. Veterans during military service, including potential exposure to contaminated water at U.S. Marine Corps Base Camp Lejeune. I have been the Chief Consultant of HOME since April 2020. Prior to being Chief Consultant, I was the Deputy Chief Consultant from December 2016 to August 2019 and Acting Chief Consultant from August 2019 to April 2020.

3. Prior to the Department of Veteran Affairs, I served with the U.S. Army for 33 years and retired at the rank of Colonel. I entered the Army after medical school at the University of

Osteopathic Medicine and Health Science in Des Moines, Iowa. I am board certified in Emergency Medicine and have had a long and diverse career as a health provider.

4. In my current role as Chief Consultant of HOME, and at the request of the Veteran's Benefit Administration ("VBA"), I authored a presentation on Camp Lejeune registries. This was at the request of the VBA for its Federal Advisory Committee Act (FACA) Advisory Committee on Disability Compensation as an informational brief about registries. The purpose of the presentation was to discuss the use and limitations of research registries and that research registries are not for the purpose of healthcare or benefits. The presentation was given once on 28 June 2023. I included non-research registries to show what other lists were related to Camp Lejeune. The information on these lists were from Scott Williams, a Program Manager for the US Marine Corps Camp Lejeune Program. This presentation was included in Plaintiffs' Memorandum in Support of their Motion for Reconsideration of Court's Order Denying the Motion to Compel Production of Muster Rolls. *See* Exhibit A to DE 193.

5. On Page 5 of this presentation, I reference the Marine Corps Unit Diary Database (MUDD). The name "MUDD" and all related information came from Scott Williams, Environmental Programs Manager for Marine Corps Installation East. I have no independent knowledge of the MUDD's existence, location, contents, or searching capabilities, as I personally have never accessed the MUDD or any other collection of digitized muster rolls or unit diaries.

I declare under penalty of perjury that the foregoing is true and correct.

**PATRICIA
HASTINGS**

Digitally signed by
PATRICIA HASTINGS
Date: 2024.05.06
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